NOTICE OF VIOLATION - NESHAP

PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH

AIR MANAGEMENT SERVICES ASBESTOS CONTROL UNIT

SPELMAN BUILDING, 321 UNIVERSITY AVENUE, 2ND FLOOR
PHILADELPHIA. PA 19104-4543

YOU ARE IN VIOLATION OF THE SECTIONS CHECKED BELOW. TAKE PROMPT ACTION TO CORRECT THIS VIOLATION, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN THE NOTICE WITHIN 5 DAYS TO THE ADJOINING ADDRESS. FAILURE TO CORRECT VIOLATION MAY RESULT IN THE DEPARTMENT OF LICENSES AND INSPECTIONS CONTRACTING TO ALLEVIATE THE VIOLATION. YOU WILL BE CHARGED THE COST INCURRED PLUS A 20-ADMINISTRATION FEE. THIS VIOLATION MAY TO SESULT IN LEGAL ACTION. TO APPEAL ANY VIOLATION OF THIS NOTICE, APPLY TO THE BOARD OF LICENSE AND INSPECTION REVIEW, MUNICIPAL SERVICES BUILDING, CONCOURSE LEVEE, 1401 JOHN F. KENNEDY BLVD., PHILA., PA 19102-1687 WITHIN 30 DAYS OF THIS NOTICE.

<u> </u>	Phica	UELPHIA, PA 19104-4545	,	100 M CO HO D TO THE CO.	· • · · · · · · · · · · · · · · · · · ·					
	n Name ew Huntingdon Construction	n Co., Inc.	Job Name Arsenal Business Center Blo	Date Issued 9/20/2010						
	n Address O. Box 26767		Job Location 2275 Bridge St. 19137	Date of Violation 9/20/2010						
	r, State, Zip kins Park, PA 19027		Person Contacted & Title John R. Rynkiewicz, superv	Project Number						
	Building Owner 🔲 Demo Co	ntractor 🗸 Abatement Con	tractor API Other	Substantive []	Non Substantive					
			TANDADO 500 HATADONIO AID DOLLAR	A V.T.O. A GODE COTO ON A SOUL OF D	STANDARD STANDARD					
<u> </u>	VIOLATION PURSUANT TO 40 CFR PART 61 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS: ASBESTOS NESHAP REVISION: FINAL RULE									
۱	INSPECTION/NOTIFICATION				Y .					
片	40 CFR 61.145(a)	Failure to inspect prior to dem	dition of renovation							
	40 CFR 61.145(b)	Failure to provide notification								
lН	40 CFR 61.145(b)(2) 40 CFR 61.145(b)(3)(i)	Failure to update notification	10 days prior to demolition or renovat	ion						
님		•	s possible prior to demolition if ordere		nont					
	40 CFR 61.145(b)(3)(iii)		s possible prior to demonitor it ordere ate ASAP no later than original start d		nent					
lΗ	40 CFR 61.145 (b)(A)(2) 40 CFR 61.145(b)(B)(1)		ate 10 days before work begins	ate						
片	40 CFR 61.145 (b)(C)(4)	N N 0 VIC DA 1-0 N CO-100 D COC 15 CO	ormation ~ CIRCLE SECTION(S)							
			detect asbestos (vi) c schedule (x) work methods info (xvi) unexpected event							
l	EMISSION CONTROL									
\sqcup	40 CFR 61.145(c)(1)	Failure to remove RACM prior to renovation or demolition								
\checkmark	40 CFR 61.145(c)(1)(iii)	Failure to adequately wet exposed RACM not removed from demolition due to safety reasons								
	40 CFR 61.145(c)(3)	Failure to adequately wet RACM when removing								
	40 CFR 61.145(c)(6)(i)		CM to ensure it remains wet until colle	188						
	40 CFR 61.145(c)(8)	Failure to provide authorized r	epresentative trained as provided by	regulation and evidence of	f training or refresher					
l _	IMPROPER DISPOSAL									
	40 CFR 61.150(a)		f visible emission to outside air during	collection, packaging or tr	ransportation					
\checkmark	40 CFR 61.150(a)(1)(i)	Failure to adequately wet RAC								
Ш	40 CFR 61.150(a)(1)(iii)	Failure to seal in leak tight cor								
$\overline{\mathbf{V}}$	40 CFR 61.150(a)(1)(iv)		vrapped materials with specified OSH	A CONTRACTOR ASSESSMENT OF THE PARTY OF THE						
\checkmark	40 CFR 61.150(a)(1)(v)		pped materials with name of generate							
	40 CFR 61.150(a)(3)	A GENTRAL CANCERN CERTS CALCEROMINATED PARTICULAR CANCER CANCELLAR CONTROL OF CASE OF	CM at all times after demolition and ke	and according continuous and a continuous and a con-	d loading (ID buildings)					
	40 CFR 61.150(a)(5)(b)	The second secon	as soon as practical by waste genera							
$\overline{\mathbf{V}}$	40 CFR 61.150 (a)(5)(c)		to transport asbestos waste during loa	ading and unloading	e e					
$\overline{\mathbf{Z}}$	40 CFR 61.150(d)(1)	Failure to maintain waste ship								
	40 CFR 61.150(d)(4)		int records not received in 45 days							
	40 CFR 61.150(d)(5)	Failure to retain copy of waste								
\checkmark	40 CFR 61.150(d)(5)(e)	Failure to make available all re	ecords							
	er Violations and/ or Instruction of the control of		documented in digital photogra	aphs. All material was	s dry in bags. Workers					
wo	re no suits/respirators. Wo	rk area was not plasticized	 No engineering controls in p 	lace. No air monitorir	ng. Please respond to					
thi	s notice of violation within 5	days of receipt.								
				*						
i e										
Insp	Inspector Signature:									

,			AIR MANAGEME · ASBESTOS CONT		دوکاناهی کشور به دو این			
LOCATION (BUILDING NAME) Arsenal Business Center Bldg 121			ADDRESS 2275 Bridge St.					
COMPLAINANT NAME n/a CONTACTED			COMPLAINANT ADDRESS n/a					
CONTRACTOR New Huntingdo		SUPERVISOR Joh	ın R. Rynkiewicz					
ASBESTOS PROJECT INSPECTOR n/a			LAB EMSL					
A. TYPE OF ACTIVITY B. TYPE OF PROJECT	15 14	ACTIVITY TIME	3:30-10:00a	PROJECT NO.	DATE 9/20/2010			
C. BULK SAMPLE	5	VIOLATION		INSPECTOR NO. 431	HEALTH DISTRICT 7			
D. PROTECTIVE EQUIPMENT	2	YES 1	NO	L				
E. WORKER/SUPERVISOR CERT.	1	1 = 2 = 2	·	AMPLE IDENTIFICATION NUMBER	 			
F. RECOMMENDATION G. WRITTEN REPORT	2			· 5-09-20-10-C	5.E5-09-2070-E			
S. WALLEN REPORT				ES-09-20-10-12				
Unnotified and illegal asbestos abatement observed and documented in Building 121 of the Arsenal Business Center located at 2275 Bridge 5t. Workers observed without suits, respirators moving dry bags of asbestos containing pipe insulation (ACPI) from the basement to the first floor. No engineering controls in place. No asbestos project inspector present. No air monitoring taking place. Work area was not plasticized. No amended water or related equipment was observed; material was completely dry. Upon arrival to the site the morning of 9/20/2010, bags appeared to be imminent for transport on to a truck and possibly off site without any waste manifest, shipping labels, etc. The contractor and the building owner are in violation of both the City of Philadelphia Asbestos Control Regulations and the National Emissions Standards for Hazardous Air Pollutants.								
Elul/	phil							
/								

NOTICE OF VIOLATION - NESHAP

PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH

AIR MANAGEMENT SERVICES ASBESTOS CONTROL UNIT

SPELMAN BUILDING, 321 UNIVERSITY AVENUE, 2ND FLOOR

YOU ARE IN VIOLATION OF THE SECTIONS CHECKED BELOW. TAKE PROMPT ACTION TO CORRECT THIS VIOLATION, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN THE NOTICE WITHIN 5 DAYS TO THE ADJOINING ADDRESS. FAILURE TO CORRECT VIOLATION MAY RESULT IN THE DEPARTMENT OF LICENSES AND INSPECTIONS CONTRACTING TO ALLEVIATE THE VIOLATION. YOU WILL BE CHARGED THE COST INCURRED PLUS A 20° ADMINISTRATION FEE. THIS VIOLATION MAY RESULT IN LEGAL ACTION. TO APPEAL ANY VIOLATION OF THIS NOTICE, APLY TO THE BOARD OF LICENSE AND INSPECTION REVIEW, MUNICIPAL SERVICES BUILDING, CONCOURSE LEVEL, 1401 JOHN F. KENNEDY BLVD., PHILA., PA 19102—1687 WITHIN 30 DAYS OF THIS NOTICE.

	PHILAC	DELPHIA, PA 19104-4543		198 / MITHIN 30	DAYS OF THIS NOTICE.			
	n Name senal Associates		Job Name Date Issued Arsenal Business Center Bldg 121 9/20/2010					
	n Address 01 Tacony St. Box 101		Job Location 2275 Bridge St.	Date of Violation 9/20/2010				
	, State, Zip iladelphia, PA 19137		Person Contacted & Frank Dellmyer	& Title		Project Number		
	Building Owner Demo Cor	ntractor Abatement Cont		Other	✓ Substantive N	Ion Substantive		
<u>.</u>								
	VIOLATION PURSUANT TO 40 CI	FR PART 61 NATIONAL EMISSION ST	ANDARD FOR HAZARDO	US AIR POLLUT	ANTS: ASBESTOS NESHAP RE	VISION: FINAL RULE		
	INSPECTION/NOTIFICATION		e' s y					
	40 CFR 61.145(a)	Failure to inspect prior to dem	olition or renovation					
\checkmark	40 CFR 61.145(b)	Failure to provide notification						
	40 CFR 61.145(b)(2)	Failure to update notification						
\sqcup	40 CFR 61.145(b)(3)(i)	Failure to postmark or deliver						
\square	40 CFR 61.145(b)(3)(iii)	Failure to postmark as early as	AND DESCRIPTION OF THE PERSON			ient		
Ц	40 CFR 61.145 (b)(A)(2)	Failure to provide new start da			ate			
	40 CFR 61.145(b)(B)(1)	Failure to provide new start da	USI	100				
√	40 CFR 61.145 (b)(C)(4) EMISSION CONTROL	Failure to include required information – CIRCLE SECTION(S) (i) type of notice (ii) owner info. (iii) type of operation (iv) facility description (v) procedure to detect asbestos (ii) amount of material (vii) location of facility (viii) abatement work schedule (ix) demo/reno work schedule (viii) disposal site (xiii) trained person (xiv) id information (vv) emergency info. (vv) unexpected every procedures (vvii) waste transp. Info.						
\Box	40 CFR 61.145(c)(1)	Failure to remove RACM prior	to renovation or demoi	ition				
	1 2 2 2	Failure to remove RACM prior to renovation or demolition Failure to adequately web exposed RACM not removed from demolition due to safety reasons						
V	40 CFR 61.145(c)(1)(iii)	Failure to adequately wet exposed RACM not removed from demolition due to safety reasons Failure to adequately wet RACM when removing						
✓	40 CFR 61.145(c)(3)	Failure to adequately wet RACM to ensure it remains wet until collected for disposal						
H	40 CFR 61.145(c)(6)(i)	Failure to provide authorized representative trained as provided by regulation and evidence of training or refresher						
Ш	40 CFR 61.145(c)(8) IMPROPER DISPOSAL	railure to provide authorized in	epiesentative trained a	s provided by	regulation and evidence of	training of refresher		
	40 CFR 61.150(a)	Failure to prevent discharge of	f visible emission to out	side air during	collection, packaging or tra	ansportation		
\checkmark	40 CFR 61.150(a)(1)(i)	Failure to prevent discharge of visible emission to outside air during collection, packaging or transportation Failure to adequately wet RACM for disposal						
	40 CFR 61.150(a)(1)(iii)	Failure to seal in leak tight con		appina				
片	40 CFR 61.150(a)(1)(iv)	Failure to label containers or w	=	5.5 (5)	A warning labels			
\ \ \	40 CFR 61.150(a)(1)(v)	Failure to label containers/wra				as generated		
	40 CFR 61.150(a)(3)	Failure to adequately wet RAC						
H	40 CFR 61.150(a)(5)(b)	Failure to deposit ACM waste						
닑	40 CFR 61.150 (a)(5)(c)	Failure to mark vehicles used						
V	40 CFR 61.150(d)(1)	Failure to maintain waste shipi						
	40 CFR 61.150(d)(4)	Failure to report waste shipme		in 45 days				
H	40 CFR 61.150(d)(5)	Failure to retain copy of waste						
H	40 CFR 61.150(d)(5)(e)	Failure to make available all re	The second secon					
V								
0.1	- Malakaa	·····						
Other Violations and/ or Instructions: Unnotified asbestos abatement/disposal observed and documented in digital photographs. All material was dry in bags. Workers wore no suits/respirators. Work area was not plasticized. No engineering controls in place. No air monitoring. Please respond to this notice of violation within 5 days of receipt.								
1	Santau Cianata							
ınst	pector Signature:	1 photo						

CITY OF PHILADELPHIA · AIR MANAGEMENT SERVICES INSPECTION REPORT · ASBESTOS CONTROL UNIT									
LOCATION (BUILDING NAME) Arsenal Business Center Bldg 121			ADDRESS 2275 Bridge St.						
COMPLAINANT NAME n/a	NTACTED YES NO	COMPLAINANT ADDRESS n/a							
CONTRACTOR New Huntingdo	on Construction Co., In		SUPERVISOR Joh	n R. Rynkiewicz					
ASBESTOS PROJECT INSPECTOR n/a			LAB EMSL						
A. TYPE OF ACTIVITY	15	ACTIVITY TIME	3:30-10:00a	PROJECT NO.	DATE 9/20/2010				
B. TYPE OF PROJECT	14	ļ		INCORPORADO					
C. BULK SAMPLE D. PROTECTIVE EQUIPMENT	5	VIOLATION YES N	NO	INSPECTOR NO. 431	HEALTH DISTRICT 7				
E. WORKER/SUPERVISOR CERT.	2	A LES		 MPLE IDENTIFICATION NUMBI	ER(c)				
F. RECOMMENDATION	1 2	1 = 0 0							
G. WRITTEN REPORT	1	1. ES-09-	2070-74 3	E5-09-20-10-0	C s.ES-09-20-10-E				
J. WILLIEU NEI ONI	_ 	VATIONS A	ND / OD INCTO	LICTIONS					
Unnotified and illegal asbestos abatement observed and documented in Building 121 of the Arsenal Business Center located at 2275 Bridge St. Workers observed without suits, respirators moving dry bags of asbestos containing pipe insulation (ACPI) from the basement to the first floor. No engineering controls in place. No asbestos project inspector present. No air monitoring taking place. Work area was not plasticized. No amended water or related equipment was observed; material was completely dry. Upon arrival to the site the morning of 9/20/2010, bags appeared to be imminent for transport on to a truck and possibly of site without any waste manifest, shipping labels, etc. The contractor and the building owner are in violation of both the City of Philadelphia Asbestos Control Regulations and the National Emissions Standards for Hazardous Air Pollutants.									

V.02667

NOTICE OF VIOLATION - MAJOR

PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH

AIR MANAGEMENT SERVICES ASBESTOS CONTROL UNIT

YOU ARE IN VIOLATION OF THE SECTIONS CHECKED BELOW. TAKE PROMPT ACTION TO CORRECT THIS VIOLATION, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN THE NOTICE WITHIN 5 DAYS TO THE ADJOINING ADDRESS. FAILURE TO CORRECT VIOLATION MAY RESULT IN THE DEPARTMENT OF LICENSES AND INSPECTIONS CONTRACTING TO ALLEVIATE THE VIOLATION. YOU WILL BE CHARGED THE COST INCURRED PLUS A 20% ADMINISTRATION FEE. THIS VIOLATION MAY RESULT IN LEGAL ACTION. TO APPEAL ANY VIOLATION OF THIS NOTICE, APPLY TO THE BOARD OF LICENSE AND INSPECTION REVIEW, MUNICIPAL SERVICES BUILDING, CONCOURSE LEVEL, 1401 JOHN F. KENNEDY BLUDD., PHILA., PA 19102-1687 WITHIN 30 DAYS OF THIS NOTICE.

SPELMAN BUILDING, 321 UNIVERSITY PHILADELPHIA, PA 1910	AVENUE, 2 ND FLO	OR	OF THIS NOTICE, MUNICIPAL SERVI	APPLY	UILDING, CONCOURSE	ION. TO APPEAL ANY VIOLATION ICENSE AND INSPECTION REVIEW, LEVEL, 1401 JOHN F. KENNEDY DAYS OF THIS NOTICE.
Firm Name Arsenal Associates	Job Name Arsenal Business Center Bldg 121				Date Issued 9/20/2010	
Firm Address 5301 Tacony St. Box 101	Job Location 2275 Bridge St. 19137				Date of Violation 9/20/2010	
City, State, Zip Philadelphia, PA 19137		Person Contacted 8 Frank Dellmyer	& Title			Project Number
Building Owner Demo Contractor Ab	oatement Con	tractor API	Other [✓ Si	ubstantive 🔲 N	Ion Substantive
VIOLATION(S) PURSUANT TO TITLE 6	, HEALTH C	ODE, OF THE PHI	LADELPHIA	COD	E, SPECIFICA	LLY CHAPTER 6-600
SECTION II. LICENSES	SECTION	VI. MAJOR PROJECTS (CO	ONT.)		SECTION VI. MAJO	OR PROJECTS (CONT.)
A. unlicensed asbestos contractor	√ 20.a. neg	ative pressure on 24 hour	's		e.(.25) bag used or	n vertical pipes
B.3.b. unlicensed asbestos workers	✓ 20.b. failu	ure to maintain neg. press	ure diff., 0.02"	_	VI.C.7. WASTE DIS	POSAL PROCEDURES
SECTION III. PERMITS & NOTIFICATIONS	✓ 20.e. failu	ure to stop abatement upo	on neg. air loss	V	a. failure to thorou	ighly wet ACM for disposal and
✓ A.1. failure to obtain permit	(1) inlets	√ (2) decon seal √ (3)) air monitoring		place in 6 mil bags	
A.2.a. failure to provide required information	Appendix of the service	re to maintain negative ai			b. failure to place	contaminated materials or
SECTION IV. CERTIFICATION	accordan	ce with EPA560/5-85-024,	, Appendix J		clothing in 6 mil ba	ags
C.1. failure to provide valid API certification	l. failure t	to meet requirements whi	ile exhausting		c. failure to seal, d	ouble bag, and transport to
SECTION VI. MAJOR PROJECT STANDARDS	negative	air indoors			approved landfill	
✓ A. failure to obtain project inspector	VI.C.1. A	SBESTOS PROJECT PROCE	DURES		d. failure to place :	sharp objects in fiber drum
A.1. failure of API to notify department	✓ b. failure	to don proper personal ed	quipment before		VI.C.8. WORK ARE	A CLEANUP PROCEDURES
VI.B. WORK AREA PREPARATION	entering			\checkmark	a. failure to wet wi	ipe/HEPA vacuum plastic
✓ 2. failure to post occupant notification	c. failure	to provide sufficient equip	pment and	\checkmark	f. failure to leave c	ritical barriers in place until
3. failure to post caution signs (OSHA)	clothing	clothing d.(3.) failure to maintain entry and exit log			airborne asbestos	levels meet re-occupancy
4. failure to construct isolation barrier	√ d.(3.) fails				standard set forth	in VI D.5 of the ACR
5. isolation barrier requirements not met:	d.(4.) faile	ure of all individuals, befo	re entering the		VI.D. AIR MONITO	RING
✓ a. framing ✓ b. plywood ✓ c. plastic	work area	a, to be familiar with all po	osted regs,	\checkmark	1. failure to collect	required samples by API
7.a. failure to pre-clean, remove movable objects	personal	protection requirements		V	3. failure to use inc	dependent certified lab or to
7.b. failure to pre-clean, seal fixed objects	√ d.(5.) faile	ure to don proper equipm	ent & clothing		have results readil	y available
7.c. failure to pre-clean, seal all other surfaces	☐ VI.C.2. GI	ENERAL REMOVAL PROCE	DURES		failure to meet foll	lowing air sampling regulations:
8. plastic isolation (critical barriers)	a. failure	to properly wet w/amend	led water	\checkmark	4.a., 2.b. number of	of pre-test samples
11. failure to maintain emergency exits	b. failure	to lower material to floor	(>15 ft.)	$\overline{\mathbf{V}}$	4.a., 2.c. pre-test s	amples/routine conditions
12. failure to lock entrances (except emergency)	d. failure	to sponge or wipe surface	es clean	V	4.a., 2.d. project sa	ample/locations
13. failure to seal floor drains (2 layers)	e. failure	to decon. equipment befo	ore removal	V	4.b., 2.e. project sa	amples/24 hours posted
14. failure to shut down elevators	f. failure t	to retrieve waste water		V	4.b., 2.f. response	action adequate
15. failure to turn off HVAC systems	VI.C.3. CC	ONTAINMENT BAG TECHN	IIQUE	1	4.c., 2.b. clearance	sample after visual
16. failure to meet electrical requirements (GFI)	a. failure	to properly use containme	ent bag, single		inspection	
18. failure to overlap plastic 12" floor, walls	use elbov	vs and pipe only		\checkmark	4.c., 2.d. clearance	sampling procedure
19.a. failure to provide 3 stage worker decon unit	b. failure	to have two persons per b	oag		VI.E. PROJECT CON	APLETION
19.b. failure to line unit 2 layers plastic	c.(.3) failu	ure to remove occupants o	or have barrier	\checkmark	1.a.(.5)failure to si	ubmit proof of final project cost
✓ 19.c. failure to frame, sheath decon (public access)	c.(.4) failu	ire to have single layer pla	stic all openings	\checkmark	4. failure to submit	t final visual inspection
19.e.(.7) failure to have lockable shuttered door	c.(.5) failu	ire to have single layer pla	stic on floor (5')		report and/or lab r	eport within 10 days
✓ 19.e. worker clean room regulations not met:	e.(.6) failu	ure to smoke test bags			SECTION X INSPEC	TIONS & REPORTS
√ (.1) √ (.2) √ (.3) √ (.4) √ (.5) √ (.6)	✓ e.(.13) fai	lure to lift off ACM while	wet		failure to have asb	estos Investigator on job site
19.f. worker shower room regulations not met:	e.(.16) fai	lure to collapse bag w/HE	PA vacuum		PA ACT 1990 - 194	/SECTION 9.(a)(2)
√ (.1) √ (.2) √ (.3) √ (.4)	e.(.20) fai	lure to 6 mil bag over con	tainment bag		Asbestos worker/s	upervisor certification
19.g. equipment room regulations not met:	✓ e.(.21) fai	lure to clean all work surfa	aces			
√ (.1) √ (.2) √ (.3) √ (.4) √ (.a) √ (.ii)	e.(.24) fai	lure to dispose in accorda	nce w/VI.C.7	1	PHILA. HEALTH CO	DE 6-604-9(a)
Other Violations and/ or Instructions:			*** *****			
Unnotified asbestos abatement/disposal of	served and	documented in dia	ital photograp	hs. A	All material was	dry in bags. Workers
wore no suits/respirators. Work area was r						
this notice of violation within 5 days of rece	5	5 5	,			
Inspector Name (Print):	<u> </u>	Inspecto	r Signature:		1011	
Ed Skirkie	specto	. 5.5.1.0.01.0.	Ell	rdpho		

CITY OF PHILADELPHIA · AIR MANAGEMENT SERVICES INSPECTION REPORT · ASBESTOS CONTROL UNIT								
LOCATION (BUILDING NAME) Arse	nal Business Center F	Blda 121	ADDRESS 2275 Bridge St.					
COMPLAINANT NAME		NTACTED	COMPLAINANT ADDRESS //					
n/a		YES NO	CONTRACT ADD	n/a				
CONTRACTOR New Huntingdon	n Construction Co., In	c.	SUPERVISOR John	n R. Rynkiewicz				
ASBESTOS PROJECT INSPECTOR n/a			LAB EMSL					
A. TYPE OF ACTIVITY	15	ACTIVITY TIME	3:30-10:00a	PROJECT NO.	DATE 9/20/2010			
B. TYPE OF PROJECT	14	1 '	3.30-10.00a		1			
C. BULK SAMPLE	5	VIOLATION		INSPECTOR NO. 431	HEALTH DISTRICT 7			
D. PROTECTIVE EQUIPMENT	2	YES 🔲	OV	431	,			
E. WORKER/SUPERVISOR CERT.	1		SAM	PLE IDENTIFICATION NUMBER(S)				
F. RECOMMENDATION	2	1. ES-09	20-10-1	7 3 ES-09-20-	10-C 5. ES-09			
G. WRITTEN REPORT	1	2. 5-09-	20-10-B	4.23.09-20-10	-15 -20-10-E			
	OBSERV							
Unnotified and illegal asbestos abatement observed and documented in Building 121 of the Arsenal Business Center located at 2275 Bridge St. Workers observed without suits, respirators moving dry bags of asbestos containing pipe insulation (ACPI) from the basement to the first floor. No engineering controls in place. No asbestos project inspector present. No air monitoring taking place. Work area was not plasticized. No amended water or related equipment was observed; material was completely dry. Upon arrival to the site the morning of 9/20/2010, bags appeared to be imminent for transport on to a truck and possibly off site without any waste manifest, shipping labels, etc. The contractor and the building owner are in violation of both the City of Philadelphia Asbestos Control Regulations and the National Emissions Standards for Hazardous Air Pollutants.								
Estad Political								

NOTICE OF VIOLATION - NESHAP

PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH

AIR MANAGEMENT SERVICES ASBESTOS CONTROL UNIT

SPELMAN BUILDING, 321 UNIVERSITY AVENUE, 2ND FLOOR PHILADELPHIA, PA 19104-4543 YOU ARE IN VIOLATION OF THE SECTIONS CHECKED BELOW, TAKE PROMPT ACTION TO CORRECT THIS VIOLATION, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN THE NOTICE WITHIN 5 CAYS TO THE ADJOINING ACCRESS. FAILURE TO CORRECT VIOLATION MAY RESULT IN THE DEPRATMENT OF LICENSES AND INSPECTIONS CONTRACTION TO ALLEVIATE THE VIOLATION, YOU WILL BE CHAPPET THE COST INCURRED PLUS A 20° ARMINISTRATION FEE. THIS VIOLATION MAY PESULT IN LEGAL ACTION. TO APPEAL ANY VICLATION OF THIS NOTICE, APPLY TO THE BOARD OF LICENSE AND HISPECTION PEVIEW, MUNICIPAL SERVICES SUILDING, CONCOURSE LEVEL, 141 JOHN F. KENNEDY BLVD., PHILA., PA 16) 22-1687 WITHIN 30 DAYS OF THIS NOTICE.

Firm Name Hankin Management Company	Job Name	Job Name Arsenal Business Center Bldg 2 Date Issu							
Firm Address P.O. Boc 267676	Job Location 2275 Bridge St.		Date of Violation 9/20/20/0						
City, State, Zip Elkins Park, PA 19027	Person Contacted & Title Mark Hankin, Presider	Person Contacted & Title Project Number							
☑ Building Owner ☐ Demo Contractor ☐ Abat	ement Contractor API Other	✓ Substantive	Non Substantive						
VIOLATION PURSUANT TO 40 CFR PART 61 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS: ASBESTOS NESHAP REVISION: FINAL RULE									
INSPECTION/NOTIFICATION									
40 CFR 61.145(a) Failure to inspect prior to demolition or renovation									
40 CFR 61.145(b) Failure to provide	e notification								
40 CFR 61.145(b)(2) Failure to update	notification								
40 CFR 61.145(b)(3)(i) Failure to postma	ark or deliver 10 days prior to demolition or r	enovation							
40 CFR 61.145(b)(3)(iii) Failure to postma	ark as early as possible prior to demolition if	ordered by state or local government	nent						
	e new start date ASAP no later than original								
	e new start date 10 days before work begins								
(i) type of notice amount of materi (xi) work practice	e required information - CIRCLE SECTION(S (ii) owner info. (iii) type of operation (iv) far ial (vii) location of facility (viii) abatement wo es (vii) disposal site (xiii) trained person (xiii) waste transp, info.	cility description (v) procedure to ork schedule (ix) demo/reno work	schedule 🗭 work methods						
EMISSION CONTROL	Approximation in time and less in the second								
40 CFR 61.145(C)(1) Failure to remove	e RACM prior to renovation or demolition	r to renovation or demolition							
40 CFR 61.145(C)(1)(iii) Failure to adequa	ately wet exposed RACM not removed from	osed RACM not removed from demolition due to safety reasons							
√ 40 CFR 61.145(C)(3) Failure to adequate	ately wet RACM when removing								
 ✓ 40 CFR 61.145(C)(3) ✓ 40 CFR 61.145(C)(6)(i) ✓ 40 CFR 61.145(C)(8) Failure to adequate to provide the provided to provided the provided to provide the provided to provided the provided the provided to provided the provided the	ately wet RACM to ensure it remains wet un	til collected for disposal							
40 CFR 61.145(C)(8) Failure to provide IMPROPER DISPOSAL	e authorized representative trained as provid	led by regulation and evidence of	training or refresher						
40 CFR 61.150(a) Failure to preven	it discharge of visible emission to outside air	during collection, packaging or tr	ansportation						
40 CFR 61.150(a)(1)(i) Failure to adequa	ately wet RACM for disposal								
	leak tight containers or leak tight wrapping								
40 CFR 61.150(a)(1)(iv) Failure to label of	ontainers or wrapped materials with specifie	d OSHA warning labels							
	ontainers/ wrapped materials with name of g	generator and location at which it	was generated						
40 CFR 61.150(a)(3) Failure to adequa	ately wet RACM at all times after demolition	and keep wet during handling and	d loading (ID buildings)						
40 CFR 61.150(a)(5)(b) Failure to deposit	t ACM waste as soon as practical by waste of	generator							
40 CFR 61.150 (a)(5)(c) Failure to mark v	ehicles used to transport asbestos waste du	ring loading and unloading							
40 CFR 61.150(d)(1) Failure to maintain	in waste shipment records								
	waste shipment records not received in 45 d								
	copy of waste shipment records								
40 CFR 61.150(d)(5)(e) Failure to make a	available all records								
Other Violations and/ or Instructions:									
Inspector Signature:									
10000									

VIOLATOR'S COPY

NOTICE OF VIOLATION - MAJOR

PHILADELPHIA DEPARTMENT OF PUBLIC HE 1LTH

AIR MANAGEMENT SERVICES

ASBESTOS CONTROL UNIT

SPELMAN BUILDING, 321 UNIVERSITY AVENUE, 2ND FLOOR

YOU ARE IN VIOLATION OF DECTIONS CHECKED BELOW. TAKE PROMPT ACTION TO CORRECT THIS VI. IN, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN IN ITICE WITHIN 5 DAYS TO THE ADJOINING ADDRESS. FAILURE TO CORRE. TOLATION MAY RESULT IN THE DEPARTMENT OF LICENSES AND INSPECTION CONTACTING TO ALLEVIATE THE VIOLATION YOU WILL BE CHARGED THE COST INCURRED PLUS A 20% ADMINISTRATION FEE. THIS VIOLATION MAY RESULT IN LEGAL ACTION. TO APPEAL ANY VIOLATION OF THIS NOTICE, APPLY TO THE BOARD OF LICENSE AND INSPECTION PEVIEW, MUNICIPAL SERVICES BUILDING, CONCOURSE LEVEL, 1401 JOHN F. KENNEDY

:

Inspector Name (Print): Ed Skirkie		Inspector Signature:	Elud Votre	>
Other Violations and/ or Instructions:	E-(-24) [a]		[V] FRILA. REALITY CO	JUE 0-004-3(4)
7.a. failure to pre-clean, remove movable objects 7.b. failure to pre-clean, seal fixed objects 7.c. failure to pre-clean, seal all other surfaces 8. plastic isolation (critical barriers) 11. failure to maintain emergency exits 12. failure to lock entrances (except emergency) 13. failure to seal floor drains (2 layers) 14. failure to shut down elevators 15. failure to turn off HVAC systems 16. failure to meet electrical requirements (GFI) 18. failure to overlap plastic 12" floor, walls 19.a. failure to provide 3 stage worker decon unit 19.b. failure to line unit 2 layers plastic 19.c. failure to frame, sheath decon (public access) 19.e.(.7) failure to have lockable shuttered door 19.e. worker clean room regulations not met: 19.f. worker shower room regulations not met: 19.g. equipment room regulations not met: 19.g. equipment room regulations not met:	personal d.(5.) failure VI.C.2. GE d. a. failure b. failure d. failure t. f. failure t VI.C.3. CC a. failure use elbow b. failure c.(.3) failu c.(.4) failu e.(.6) failu e.(.13) fai e.(.13) fai	protection requirements are to don proper equipment & clothing ENERAL REMOVAL PROCEDURES to properly wet w/amended water to lower material to floor (>15 ft.) to sponge or wipe surfaces clean to decon, equipment before removal to retrieve waste water ENTAINMENT BAG TECHNIQUE to properly use containment bag, single as and pipe only to have two persons per bag are to remove occupants or have barrier are to have single layer plastic all openings are to have single layer plastic on floor (5") are to smoke test bags lure to collapse bag w/HEPA vacuum lure to 6 mil bag over containment bag lure to clean all work surfaces lure to dispose in accordance w/VI.C.7	3. failure to use in have results readi failure to meet fo 4.a., 2.b. number 4.a., 2.c. pre-test: 4.a., 2.d. project s 4.b., 2.f. response 4.c., 2.b. clearance inspection 4.c., 2.d. clearance VI.E. PROJECT CO 1.a.(.5)failure to subm report and/or lab SECTION X INSPEC failure to have ast PA ACT 1990 - 196	Independent certified lab or to ly available illowing air sampling regulations: of pre-test samples samples/routine conditions samples/routine conditions samples/24 hours posted action adequate e sample after visual e sampling procedure MPLETION submit proof of final project cost it final visual inspection report within 10 days CTIONS & REPORTS pestos Investigator on job site 4/SECTION 9.(a)(2) supervisor certification
SECTION IV. CERTIFICATION C.1. failure to provide valid API certification SECTION VI. MAJOR PROJECT STANDARDS A. failure to obtain project inspector A.1. failure of API to notify department VI.B. WORK AREA PREPARATION 2. failure to post occupant notification 3. failure to post caution signs (OSHA) 4. failure to construct isolation barrier 5. isolation barrier requirements not met: a. framing b. plywood c. plastic	accordan I. failure to negative VI.C.1. AS b. failure entering c. failure clothing d.(3.) failure d.(4.) failure	ce with EPA560/5-85-024, Appendix J to meet requirements while exhausting air indoors EBESTOS PROJECT PROCEDURES to don proper personal equipment before to provide sufficient equipment and ure to maintain entry and exit log ure of all individuals, before entering the a, to be familiar with all posted regs,	clothing in 6 mil b c. failure to seal, c approved landfill d. failure to place VI.C.8. WORK ARI a failure to wet w f. failure to leave airborne asbestos standard set forth VI.D. AIR MONITO	sags double bag, and transport to sharp objects in fiber drum EA CLEANUP PROCEDURES ripe/HEPA vacuum plastic critical barriers in place until tilevels meet re-occupancy of in VI D.5 of the ACR
SECTION II. LICENSES A. unlicensed asbestos contractor B.3.b. unlicensed asbestos workers SECTION III. PERMITS & NOTIFICATIONS A.1. failure to obtain permit A.2.a. failure to provide required information	SECTION 20.a. neg 20.b. failu 20.e. failu (1) inlets	VI. MAJOR PROJECTS (CONT.) ative pressure on 24 hours are to maintain neg. pressure diff., 0.02" are to stop abatement upon neg. air loss (2) decon seal (3) air monitoring re to maintain negative air system in	SECTION VI. MAJO e.(.25) bag used o VI.C.7. WASTE DIS a. failure to thoro place in 6 mil bag	OR PROJECTS (CONT.) in vertical pipes SPOSAL PROCEDURES ughly wet ACM for disposal and
City, State, Zip Elkins Park, PA 19027 Building Owner Demo Contractor About All Demo Contractor About All Demo Contractor About All Demo Contractor Demo Contractor About All Demo Contractor Demo Contractor About All Demo Contractor Demo				Project Number Non Substantive
Hankin Management Company Firm Address P.O. Box 267676		Arsenal Business Center Blo Job Location 2275 Bridge St.	dg /2/	11/22/2010 Date of Violation 9/20/20/0
PHILADELPHIA, PA 19104 Firm Name	-4543	Job Name	, PA 19102-1687 WITHIN 30	Date Issued

NOTICE OF VIOLATION - MAJOR

PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH

AIR MANAGEMENT SERVICES ASBESTOS CONTROL UNIT

SPELMAN BUILDING, 321 UNIVERSITY AVENUE, 2ND FLOOR

YOU ARE IN VIOLATION OF THE SECTIONS CHECKED BELOW. TAKE PROMPT ACTION TO CORRECT THIS VIOLATION, COMPLETE THE ITEMS LISTED ON THE REVERSE SIDE AND RETURN THE NOTICE WITHIN 5 DAYS TO THE ADJOINING ADDRESS. FAILURE TO CORRECT VIOLATION MAY RESULT IN THE DEPARTMENT OF LICENSES AND INSPECTIONS CONTRACTING TO ALLEVIATE THE VIOLATION. YOU WILL BE CHARGED THE COST INCURRED FLUS A 20% ADMINISTRATION FEE. THIS VIOLATION AND RESULT IN LEGAL ACTION. TO APPEAL ANY VIOLATION OF THIS NOTICE, APPLY TO THE BOARD OF LICENSE AND INSPECTION REVIEW,

1	PHILADELPHIA, PA 19104-4543					VICES B	UILDING, CONCOURSE	LEVEL, 1401 JOHN F. KENNEDY DAYS OF THIS NOTICE.
Firm Name New Huntingdon Construction Co., Inc.				Job Name Arsenal Business Center Bldg 121			Date Issued 9/20/2010	
	m Address P.O. Box 26767	Job Location 2275 Bridge St. 19137			Date of Violation 9/20/2010			
City	y, State, Zip Elkins Park, PA 19027			Person Contacted a John R. Rynkiev		sor		Project Number
	Building Owner 🔲 Demo Contractor 🗸 Ab	oaten	nent Con	tractor API	Other	✓ S	ubstantive 🔲 N	lon Substantive
VIOLATION(S) PURSUANT TO TITLE 6, HEALTH CODE, OF THE PHILADELPHIA CODE, SPECIFICALLY CHAPTER 6-600								LLY CHAPTER 6-600
	SECTION II. LICENSES	,		VI. MAJOR PROJECTS (CC				OR PROJECTS (CONT.)
	A. unlicensed asbestos contractor	V		ative pressure on 24 hour		П	e.(.25) bag used or	AND
lΗ	B.3.b. unlicensed asbestos workers	Ä		re to maintain neg. press		ш		POSAL PROCEDURES
-	SECTION III. PERMITS & NOTIFICATIONS	岃		re to stop abatement up		7		ighly wet ACM for disposal and
	A.1. failure to obtain permit	7		√ (2) decon seal √ (3)		V	place in 6 mil bags	
	A.2.a. failure to provide required information	H	THE COURT OF STREET	re to maintain negative ai	-			contaminated materials or
	SECTION IV. CERTIFICATION	·		ce with EPA560/5-85-024			clothing in 6 mil ba	
$ \Box $	C.1. failure to provide valid API certification			o meet requirements wh	5 6			ouble bag, and transport to
ļ —	SECTION VI. MAJOR PROJECT STANDARDS	_	negative	air indoors		_	approved landfill	
	A. failure to obtain project inspector		VI.C.1. AS	BESTOS PROJECT PROCE	DURES		d. failure to place	sharp objects in fiber drum
	A.1. failure of API to notify department	1	b. failure	to don proper personal e	quipment before	: —	VI.C.8. WORK ARE	A CLEANUP PROCEDURES
_	VI.B. WORK AREA PREPARATION	_	entering			✓	a. failure to wet w	ipe/HEPA vacuum plastic
	2. failure to post occupant notification	П	c. failure t	to provide sufficient equi	pment and	7	f. failure to leave o	ritical barriers in place until
$\overline{\nabla}$	3. failure to post caution signs (OSHA)		clothing	clothing			airborne asbestos	levels meet re-occupancy
7	4. failure to construct isolation barrier	1	d.(3.) failure to maintain entry and exit log d.(4.) failure of all individuals, before entering the work area, to be familiar with all posted regs, personal protection requirements				standard set forth	in VI D.S of the ACR
_	5. isolation barrier requirements not met:	$\overline{\Box}$					VI.D. AIR MONITO	RING
V	a. framing 🗸 b. plywood 🗸 c. plastic	_				V	1. failure to collect	t required samples by API
	7.a. failure to pre-clean, remove movable objects					V	3. failure to use in	dependent certified lab or to
	7.b. failure to pre-clean, seal fixed objects	V	d.(5.) failu	5.) failure to don proper equipment & clothing			have results readil	y available
	7.c. failure to pre-clean, seal all other surfaces	\sqcap	VI.C.2. GE	NERAL REMOVAL PROCE	DURES		failure to meet fol	lowing air sampling regulations:
	8. plastic isolation (critical barriers)	7	a. failure t	to properly wet w/amend	led water	V	4.a., 2.b. number (of pre-test samples
	11. failure to maintain emergency exits	百	b. failure	to lower material to floor	(>15 ft.)	7	4.a., 2.c. pre-test s	amples/routine conditions
7	12. failure to lock entrances (except emergency)	7	d. failure t	to sponge or wipe surface	es clean	7	4.a., 2.d. project sa	ample/locations
V	13. failure to seal floor drains (2 layers)	1	e. failure t	to decon. equipment befo	ore removal	7	4.b., 2.e. project sa	amples/24 hours posted
ΙĦ	14. failure to shut down elevators	\sqcap	f. failure t	o retrieve waste water		7	4.b., 2.f. response	action adequate
lΠ	15. failure to turn off HVAC systems	_	VI.C.3. CO	NTAINMENT BAG TECHN	NIQUE	7	4.c., 2.b. clearance	sample after visual
7	16. failure to meet electrical requirements (GFI)	1	a. failure t	to properly use containme	ent bag, single	_	inspection	
7	18. failure to overlap plastic 12" floor, walls		use elbow	s and pipe only		\checkmark	4.c., 2.d. clearance	sampling procedure
$\overline{\mathbf{V}}$	19.a. failure to provide 3 stage worker decon unit		b. failure t	to have two persons per i	bag		VI.E. PROJECT CO	MPLETION
V	19.b. failure to line unit 2 layers plastic		c.(.3) failu	re to remove occupants o	or have barrier	\checkmark	1.a.(.5)failure to s	ubmit proof of final project cost
>>>>	19.c. failure to frame, sheath decon (public access)		c.(.4) failu	re to have single layer pla	astic all openings	· 🗸	4. failure to submi	t final visual inspection
V	19.e.(.7) failure to have lockable shuttered door		c.(.5) failu	re to have single layer pla	astic on floor (5')		report and/or lab	report within 10 days
	19.e. worker clean room regulations not met:		e.(.6) failu	ire to smoke test bags			SECTION X INSPEC	TIONS & REPORTS
✓.	(.1) 🗸 (.2) 🗸 (.3) 🗸 (.4) 🗸 (.5) 🗸 (.6)	1	e.(.13) fail	lure to lift off ACM while	wet		failure to have asb	estos Investigator on job site
	19.f. worker shower room regulations not met:		e.(.16) fail	lure to collapse bag w/HE	PA vacuum		PA ACT 1990 - 194	/SECTION 9.(a)(2)
1	(.1) 🗸 (.2) 🗸 (.3) 🗸 (.4)		e.(.20) fail	lure to 6 mil bag over con	tainment bag		Asbestos worker/s	upervisor certification
	19.g. equipment room regulations not met:	V	e.(.21) fail	lure to clean all work surf	aces			
V	(.1) (.2) (.3) (.4) (.a) (.ii)	V	e.(.24) fail	lure to dispose in accorda	ince w/VI.C.7	\checkmark	PHILA. HEALTH CO	DE 6-604-9(a)
Oth	er Violations and/ or Instructions:							
E005 540	notified asbestos abatement/disposal ob	sen	ed and	documented in dig	ital photogra	aphs. /	All material was	s dry in bags. Workers
	re no suits/respirators. Work area was n							
	s notice of violation within 5 days of rece			-	·			
Insp	pector Name (Print):			Inspecto	r Signature:	<u></u> .	10/1	
	pector Name (Print): Inspector Signature:							

			AIR MANAGEMEN ASBESTOS CONTI					
LOCATION (BUILDING NAME) Arsenal Business Center Bldg 121			ADDRESS 2275 Bridge St.					
COMPLAINANT NAME n/a		NTACTED NO	COMPLAINANT AD	DRESS n/a				
CONTRACTOR New Huntingdor	Construction Co., In		SUPERVISOR Joh	n R. Rynkiewicz				
ASBESTOS PROJECT INSPECTOR n/a			LAB EMSL					
A. TYPE OF ACTIVITY B. TYPE OF PROJECT	15	ACTIVITY TIME	8:30-10:00a	PROJECT NO.	DATE 9/20/2010			
C. BULK SAMPLE	14 5	VIOLATION		INSPECTOR NO. 431	HEALTH DISTRICT 7			
D. PROTECTIVE EQUIPMENT	2	YES 🗌	NO	431	7			
E. WORKER/SUPERVISOR CERT.	1		SAN	MPLE IDENTIFICATION NUMBER(S)			
F. RECOMMENDATION	2	1. FK-09-2						
G. WRITTEN REPORT	1	2. F5-19-1	IN-10-0 UF	Cano 201-10-C	-104-20 10-E			
		ATIONS AN	D / OD INICTOL	ICTIONS				
Unnotified and illegal asbestos abatement observed and documented in Building 121 of the Arsenal Business Center located at 2275 Bridge St. Workers observed without sults, respirators moving dry bags of asbestos containing pipe insulation (ACP) from the basement to the first floor. No engineering controls in place. No asbestos project inspector present. No air monitoring taking place. Work area was not plasticized. No amended water or related equipment was observed; material was completely dry. Upon arrival to the site the morning of 9/20/2010, bags appeared to be imminent for transport on to a truck and possibly off site without any waste manifest, shipping labels, etc. The contractor and the building owner are in violation of both the City of Philadelphia Asbestos Control Regulations and the National Emissions Standards for Hazardous Air Pollutants.								
Elend policies								